

I am a Paging carrier that is using Type 2A, with Wide Area Calling (option 2) in the State of Arizona with Qwest Communications. The Wide Area Calling covers the entire "666" LATA in Arizona, about 20 some telephone company billing areas.

Verizon's contention that deleting the Type 3A, (in my case, Wide Area Calling) would have no impact on a paging carrier is FALSE !!!

To provide the same "Level of Service", We would need to install 20, Type 1 circuits, of at least 2 trunks or more to "cover" the same area with the "Local calling" demanded by the customers. This would mean that the current amount of numbers that we used, (10,000) would increase at least 2-3 times, since NANPA only pools numbers at 1000 minimum.

We would need to "Change" the paging number that the customer is currently using., We would need to install and expand our current paging terminal to match the number of "NEW" type 1 trunks now needed. All these are expenses and disruptions in "Customer Service".

It is surprising that Verizon has over looked the fact that under the TSR decision, Verizon would have to supply all the Type 1 "LOCAL" circuits to the Paging Carrier at "NO CHARGE", and pay "termination compensation" on these, whereby they are currently getting paid for "reverse toll calls" on the current Type 3 connections .

Although I have other issues about the Wide area calling options and programming , It is still the best way that I can provide my customer with the "Level of Service" they request.

Unless my interpretation is not correct, under 51.309(a), regarding unbundled network elements," An ILEC shall not impose limitations, restrictions, or requirements on requests for, or the use of unbundled network elements that would impair the ability of a requesting telecommunications carrier to offer a telecommunications service in the manner the requesting telecommunications carrier intends."

51.319(c)(1) defines "Local circuit switching capability, including tandem capability", and states in paragraph (iii) of the section,"All features, functions and capability of the switch, which include but not limited to:" (B)"All other features that the switch is capable of providing, including but not limited to, customer calling, customer local area signaling service features and Centrex, as well as *any technically feasible customized routing functions provided by the switch*" This would seem to me to include, at the tandem, "Routing for Wide Area calling and Reverse Billing features.

I ask that the FCC not allow Verizon or other carriers to eliminate Type 3A, or Wide Area Calling from the choice of interconnection options available to Paging Carriers.

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